



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

cree for divorce whereby his wife became entitled to one-third of his property, does not abate the appeal. It survives to his heirs, and they may prosecute the cause in order to determine whether the divorce was rightfully granted and to settle conflicting property rights between them and the appellee.

Cities—Improvements in Streets—Discrimination.—*Larned v. City of Syracuse et al.*, 44 N. Y. Sup. 857. Where a petition for the pavement of a street prayed that the materials be purchased from a certain firm and the city council passed a resolution granting the petition the entire proceedings are void as preventing free competition.

Action by County to Recover Land Limitation—Adverse Possession.—*Johnston v. Llano County*, 39 S. W. Rep. 995 (Texas). Although the statute of limitation does not run against a county, as a subdivision of the State, as to any "road, street, side-walk, or grounds," yet the right of the county to recover lands not acquired or used for public purposes may be barred.

MISCELLANEOUS.

Navigable Waters—Control by the United States—Incidental Damage—Compensation—Constitutional Law.—*Gibson v. U. S.*, 17 Sup. Ct. Rep. 578. In accordance with United States River and Harbor Acts, a dike was built at a point in the Ohio River off Neville Island, nine miles west of Pittsburg, for the purpose of concentrating the water-flow in the main channel. The change of flow which followed this improvement, prevented the access of boats to the landing place of the plaintiff, a lower riparian owner, except at high stages of water in the Spring and Fall. The obstruction greatly reduced the value of the plaintiff's land and he petitioned the Court of Claims for the recovery of damages. The Supreme Court upholds the Court of Claims (29 Ct. Cl. 18) in finding the claimant not entitled to recover, there not being in this case a taking of private property for public use, without compensation, but the injury being a mere incidental consequence of the lawful exercise of Governmental power.

Negligence—Proximate Cause—Contributory Negligence—Assisting Person in Danger.—*Saun v. H. W. Johns Manf. Co.*, 44 N. Y. Sup. 641. Plaintiff's intestate, a workman in defendant's factory, had been directed to repair the pipes of a certain felt-washing machine; after so doing he and another workman made several unsuccessful attempts to put a belt upon the machine, when a third workman volunteered to assist them by holding the belt so